

Objection Deadline: January 4, 2023

James I. Stang (admitted *pro hac vice*)
Iain A.W. Nasatir
John W. Lucas
Malhar S. Pagay (admitted *pro hac vice*)
Gillian N. Brown
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Counsel to the Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11
:
MADISON SQUARE BOYS & GIRLS CLUB, : Case No. 22-10910-SHL
INC.,¹ :
:
Debtor. :
:
-----X

**FIFTH MONTHLY FEE STATEMENT OF
PACHULSKI STANG ZIEHL & JONES LLP FOR
COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

¹The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional:	Official Committee of Unsecured Creditors
Services to:	Official Committee of Unsecured Creditors
Date of Retention:	July 16, 2022
Period for which compensation and reimbursement is sought:	November 1, 2022 through November 30, 2022
Monthly Fees Incurred:	\$154,915.50
Fee Reduction:	(\$30,325.50) ²
Fees (After Reduction):	\$124,590.00
20% Holdback:	\$24,918.00
Total Fees Less 20% Holdback:	\$99,672.00
Monthly Expenses Incurred:	\$4,111.19
Total Fees and Expenses Due:	\$103,783.19

This is a X monthly interim final application

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, the *Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to*

² As disclosed in the Firm's employment application, the Firm is utilizing rates that are reduced from standard rates so that attorney time is capped at \$900 per hour and paralegal time is capped at \$400 per hour. The reduction set forth in this Fee Statement here accounts for the reduction from the following standard rates, as set forth in Exhibit A hereto: J. Stang (\$1,525); K. Brown (\$1,395); I. Nasatir (\$1,295); M. Litvak (\$1,275); M. Pagay (\$1,095); J. Lucas (\$1,095); R. Saunders; (\$1,025); G. Brown (\$925); B. Dassa (\$495); L. Carty (\$495); and M. Matteo (\$460).

the Official Committee of Unsecured Creditors Effective as of July 16, 2022 [Docket No. 196] (the “PSZJ Retention Order”), and the Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals [Docket No. 125] (the “Interim Compensation Order”);³ Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors (the “Committee”) hereby submits this fifth monthly fee statement (the “Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Committee in this chapter 11 case (the “Case”) during the period November 1, 2022 to November 30, 2022 (the “Fee Period”).

By this Fee Statement, PSZJ seeks payment in the amount of \$103,783.19, comprised of the following: (i) \$99,672.00, which is eighty percent (80%) of the total amount of fees incurred for actual and necessary services rendered during the Fee Period, and (ii) reimbursement of \$4,111.19, which is one hundred percent (100%) of actual and necessary expenses that PSZJ incurred in connection with its representation of the Committee during the Fee Period.

Services Rendered and Expenses Incurred

1. Attached as Exhibit A is a summary of PSZJ’s professionals by individual, setting forth the (i) name and title of each individual who provided services in connection with this chapter 11 case during the Fee Period, (ii) the year of bar admission for each PSZJ attorney, (iii) the current, standard hourly billing rate for each individual at PSZJ working on this chapter 11 case during the Fee Period, (iv) the capped hourly rate for those individuals, and (v) the total fees that each individual billed to this Case during the Fee Period at the applicable capped billing rate. The Committee hired PSZJ on the condition that the total fees incurred would be discounted to the extent the blended rate of PSZJ attorneys does not exceed \$900.00 per hour. All of the

³ Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

PSZJ attorneys who worked on this Case during the Fee Period have standard billing rates in excess of \$900.00 per hour. As provided in the PSZJ Retention Order, PSZJ paralegal hourly rates on this Case will not exceed \$400.00 per hour. All of the PSZJ paralegals who worked on this Case during the Fee Period have standard billing rates in excess of \$400.00 per hour. PSZJ is providing a reduction in attorney and paralegal fees for the Fee Period in the amount of \$30,325.50.

2. Attached as Exhibit B is a summary of the services PSZJ rendered during the Fee Period and the compensation it seeks, by project category.

3. Attached as Exhibit C is a summary of expenses that PSZJ incurred during the Fee Period and for which it seeks reimbursement.

4. Attached as Exhibit D is itemized time detail of PSZJ professionals during the Fee Period and summary materials related thereto.

Notice and Objection Procedures

5. Notice of this Fee Statement shall be given by U.S. Mail, or by email where available, upon (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Mr. Tim McChristian); (b) Debtor's counsel: Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Esq.; Andrew M. Parlen, Esq.; John T. Weber, Esq.; and Miriam Levi, Esq.); and (c) William K. Harrington, United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz, Esq. and Tara Tiantian, Esq.) (the "Notice Parties").

6. Objections to this Fee Statement, if any, must be filed with the Court and served upon PSZJ and the other Notice Parties (set forth at para. 5, above) so as to be received no later than **January 4, 2023** (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

7. If no Objections to this Fee Statement are filed and served as set forth above, the Debtor shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses set forth in this Fee Statement.

8. If an Objection to this Fee Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. *See* Interim Compensation Order. To the extent such an Objection is not resolved between PSZJ and the party filing the Objection, the Objection shall be preserved and scheduled for consideration at the next interim fee application hearing.

Dated: December 20, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Gillian N. Brown

James I. Stang (admitted *pro hac vice*)
Iain A.W. Nasatir
John W. Lucas
Malhar S. Pagay (admitted *pro hac vice*)
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Counsel to the Official Committee of Unsecured Creditors

EXHIBIT A

Compensation by Professional

**SUMMARY OF COMPENSATION BY PROFESSIONAL
FOR SERVICES RENDERED FOR THE PERIOD
NOVEMBER 1, 2022 – NOVEMBER 30, 2022**

Name of Professional Partners and Counsel	Title	Year Admitted	Standard Hourly Rate (\$)	Capped Hourly Rate in this Case (\$)	Total Billed Hours	Total Compensation at Capped Rate (\$)
James I. Stang	Partner	1980	1,525.00	900.00	9.70	\$8,730.00
Kenneth H. Brown	Partner	1981	1,395.00	900.00	0.90	810.00
Iain A.W. Nasatir	Partner	1983	1,295.00	900.00	9.10	\$8,190.00
Maxim B. Litvak	Partner	1997	1,275.00	900.00	3.30	\$2,970.00
Malhar S. Pagay	Partner	1997	1,095.00	900.00	41.10 ⁴	\$36,990.00
John W. Lucas	Partner	2005	1,095.00	900.00	45.50	\$40,950.00
Robert M. Saunders	Counsel	1995	1,025.00	900.00	1.40	\$1,260.00
Gillian N. Brown	Counsel	1999	925.00	900.00	19.30	\$17,370.00
Total Partners and Counsel:				130.30		\$117,270.00

Name of Paralegals and Other Non-Legal Staff	Standard Hourly Billing Rate (\$)	Capped Hourly Rate in this Case (\$)	Total Billed Hours	Total Compensation at Capped Rate (\$)
Beth D. Dassa	495.00	400.00	9.00	\$3,600.00
La Asia S. Carty	495.00	400.00	0.80	\$320.00
Mike A. Matteo	460.00	400.00	8.50	\$3,400.00
Total Paralegals and Other Non-Legal Staff:			18.30	\$7,320.00

ALL PROFESSIONALS	DISCOUNTED/CAPPED BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Attorneys	900.00	130.30	\$117,270.00
Paralegals, Non-Legal Staff	400.00	18.30	\$7,320.00
Total Hours and Fees Incurred		148.60	\$124,590.00

⁴ PSZJ inadvertently omitted from its October Monthly Fee Statement [Docket No. 295] some of the time Mr. Pagay billed in October 2022. That time from October 2022 is included this Fee Statement.

EXHIBIT B

Compensation by Task Code

**AGGREGATE TIME SUMMARY BY TASK CODE
FOR THE PERIOD NOVEMBER 1, 2022 – NOVEMBER 30, 2022**

Task Code	Project Category	Total Hours	Total Fees (\$)
AA	Asset Analysis & Recovery	0.50	697.50
BL	Bankruptcy Litigation	40.30	37,721.00
CA	Case Administration	0.30	148.50
CO	Claims Admin/Objections	6.30	6,219.50
CP	Compensation of Professionals	3.40	1,898.00
CPO	Compensation of Professionals/Other	5.20	2,961.00
FN	Financing	24.70	27,666.50
GC	General Creditors Committee	37.40	42,691.00
HE	Hearings	8.90	11,048.50
IC	Insurance Coverage	1.40	1,435.00
ME	Mediation	6.70	8,402.50
PD	Plan & Disclosure Statement	8.50	9,427.50
RPO	Retention of Professionals/Other	5.00	4,599.00
	TOTAL		\$154,915.50 less discount of \$30,325.50, for total of \$124,590.00

EXHIBIT C

Expense Summary

**AGGREGATE ITEMIZED EXPENSES FOR THE PERIOD
NOVEMBER 1, 2022 – NOVEMBER 30, 2022**

Expenses Category	Total Expenses (\$)
Auto Travel Expense	1,349.30
Working Meals	249.84
Conference Call	2.31
Delivery Service/Messenger	231.89
Federal Express	95.28
Hotel Expense	1,026.70
Lexis/Nexis Legal Research	24.60
Outside Services	332.00
Postage	28.47
Reproduction Expense	22.50
Reproduction/Scan Copy	25.10
Research	500.00
Transcript	223.20
TOTAL	\$4,111.19

EXHIBIT D

Itemized Time Detail for the Fee Period

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

November 30, 2022

GNB
Invoice 131456
Client 54162
Matter 00004
GNB

GNB

RE: Committee Representaton

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/2022

FEES	\$154,915.50
EXPENSES	\$4,111.19
LESS COURTESY DISCOUNT	\$30,325.50
TOTAL CURRENT CHARGES	\$128,701.19
BALANCE FORWARD	\$403,901.31
TOTAL BALANCE DUE	\$532,602.50

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BDD	Dassa, Beth D.	Paralegal	495.00	9.00	\$4,455.00
GNB	Brown, Gillian N.	Counsel	925.00	19.30	\$17,852.50
IAWN	Nasatir, Iain A. W.	Partner	1295.00	9.10	\$11,784.50
JIS	Stang, James I.	Partner	1525.00	9.70	\$14,792.50
JWL	Lucas, John W.	Partner	1095.00	45.50	\$49,822.50
KHB	Brown, Kenneth H.	Partner	1395.00	0.90	\$1,255.50
LSC	Canty, La Asia S.	Paralegal	495.00	0.80	\$396.00
MAM	Matteo, Mike A.	Paralegal	460.00	8.50	\$3,910.00
MBL	Litvak, Maxim B.	Partner	1275.00	3.30	\$4,207.50
MSP	Pagay, Malhar S.	Partner	1095.00	41.10	\$45,004.50
RMS	Saunders, Robert M.	Counsel	1025.00	1.40	\$1,435.00
				148.60	\$154,915.50

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.50	\$697.50
BL	Bankruptcy Litigation [L430]	40.30	\$37,721.00
CA	Case Administration [B110]	0.30	\$148.50
CO	Claims Admin/Objections[B310]	6.30	\$6,219.50
CP	Compensation Prof. [B160]	3.40	\$1,898.00
CPO	Comp. of Prof./Others	5.20	\$2,961.00
FN	Financing [B230]	24.70	\$27,666.50
GC	General Creditors Comm. [B150]	37.40	\$42,691.00
H	Hearings	8.90	\$11,048.50
IC	Insurance Coverage	1.40	\$1,435.00
ME	Mediation	6.70	\$8,402.50
PD	Plan & Disclosure Stmt. [B320]	8.50	\$9,427.50
RPO	Ret. of Prof./Other	5.00	\$4,599.00
		148.60	\$154,915.50

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Auto Travel Expense [E109]	\$1,349.30
Working Meals [E111]	\$249.84
Conference Call [E105]	\$2.31
Delivery service/messengers	\$231.89
Federal Express [E108]	\$95.28
Hotel Expense [E110]	\$1,026.70
Lexis/Nexis- Legal Research [E	\$24.60
Outside Services	\$332.00
Postage [E108]	\$28.47
Reproduction Expense [E101]	\$22.50
Reproduction/ Scan Copy	\$25.10
Research [E106]	\$500.00
Transcript [E116]	\$223.20
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	\$4,111.19

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
11/01/2022	KHB	AA	Consider demand on debtor to prosecute declaratory relief action to determine treatment of restricted assets (.3); email to J. Stang re same (.2).	0.50	1395.00	\$697.50
				0.50		\$697.50
Bankruptcy Litigation [L430]						
10/03/2022	IAWN	BL	Exchange emails with Michael Matteo and Gillian Brown re RSUI and ORIC	0.10	1295.00	\$129.50
10/12/2022	MSP	BL	Email Iain Nasatir re: status of disputed matters for hearing.	0.10	1095.00	\$109.50
10/12/2022	MSP	BL	Email Beth E. Levine re: submission of order.	0.20	1095.00	\$219.00
10/12/2022	MSP	BL	Email Iain Nasatir re: hearing re: insurer 2004 motion.	0.30	1095.00	\$328.50
10/12/2022	MSP	BL	Attention to resolving remaining issues re: insurer Rule 2004 motion (2.2); revise order re: same (1.80); email exchange with Gillian N. Brown, Iain Nasatir, G. Seligman, John W. Lucas, R. Mendoza, C. Azzaro, et al. re: same (.30).	4.30	1095.00	\$4,708.50
10/12/2022	MSP	BL	Continue to work on resolving issues re: insurer Rule 2004 motion, submission of order resolving certain issues, etc. (2.7); email exchange with Beth E. Levine, Gillian N. Brown, G. Miller, et al. re: same (.20).	2.90	1095.00	\$3,175.50
10/13/2022	MSP	BL	Attention to resolving remaining issues re: insurer Rule 2004 motion before hearing.	1.00	1095.00	\$1,095.00
10/13/2022	MSP	BL	Emails Iain Nasatir re: hearing re: insurer 2004 motion.	0.40	1095.00	\$438.00
10/13/2022	MSP	BL	Revise order re: insurer Rule 2004 motion and seek counsel consent to further revised form of order (3.8); email exchange with G. Miller, L. Klein, Gillian N. Brown, Beth E. Levine, et al. re: same (.40).	4.20	1095.00	\$4,599.00
10/13/2022	LSC	BL	Assist with preparation and filing of amended agenda (.3); serve same (.2); draft COS and coordinate filing of the same (.3).	0.80	495.00	\$396.00
10/14/2022	MSP	BL	Meeting with M. Plevin and Iain Nasatir re: meet and confer re: insurer 2004 motion.	0.40	1095.00	\$438.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/14/2022	MSP	BL	Revise order re: insurer Rule 2004 motion.	0.10	1095.00	\$109.50
10/14/2022	MSP	BL	Email exchange with state court counsel and Committee members re: hearing on insurer Rule 2004 motion.	0.60	1095.00	\$657.00
10/14/2022	MSP	BL	Work on issues relating to insurer Rule 2004 order (2.3); email exchange with Iain Nasatir, M. Plevin, et al. re: same (.20).	2.50	1095.00	\$2,737.50
10/17/2022	MSP	BL	Revise order re: insurer Rule 2004 motion and work on resolving final disputes (2.1); email exchange with M. Plevin, G. Miller, Iain Nasatir, chambers, et al. re: same (.20).	2.30	1095.00	\$2,518.50
10/18/2022	MSP	BL	Attention to foreign insurance company issue (2.3); email exchange with Iain Nasatir re: same (.10).	2.40	1095.00	\$2,628.00
10/19/2022	MSP	BL	Telephone call with law clerk re: discovery conference re: Rule 2004 insurer order.	0.10	1095.00	\$109.50
10/19/2022	MSP	BL	Email exchange with M. Plevin, et al. re: notice of hearing re: insurer Rule 2004 order.	0.10	1095.00	\$109.50
10/19/2022	MSP	BL	Email Iain Nasatir re: discovery conference re: Rule 2004 insurer order.	0.30	1095.00	\$328.50
10/20/2022	MSP	BL	Attention to discovery matters (1.0); email exchange with Committee members, Gillian N. Brown, Iain Nasatir, et al. re: same (.10).	1.10	1095.00	\$1,204.50
10/27/2022	MSP	BL	Email exchange with Gillian N. Brown re: insurance discovery.	0.10	1095.00	\$109.50
10/28/2022	MSP	BL	Email exchange with Iain Nasatir, Gillian N. Brown re: insurance discovery.	0.10	1095.00	\$109.50
11/01/2022	GNB	BL	Telephone conference with Michael Kotula regarding Rule 2004 subpoena to Allianz Riunione.	0.10	925.00	\$92.50
11/01/2022	GNB	BL	Email with Paul Mones regarding Boys and Girls Club of America.	0.10	925.00	\$92.50
11/01/2022	MAM	BL	Update tracking chart and virtual file regarding production received from RSUI Insurance.	0.20	460.00	\$92.00
11/01/2022	MAM	BL	Update tracking chart and virtual file regarding acceptance of subpoena by counsel for Star Stone Specialty Insurance.	0.20	460.00	\$92.00
11/01/2022	MAM	BL	Updates to tracking chart and virtual file regarding Allianz Riunione response.	0.20	460.00	\$92.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/01/2022	MSP	BL	Email exchange with Gillian N. Brown, et al. re: locating insurers counsel.	0.10	1095.00	\$109.50
11/02/2022	GNB	BL	Review emails from insurance counsel for Fireman's Fund, CIM, Motors, MIC Property, and Guaranty National regarding subpoenas.	0.10	925.00	\$92.50
11/02/2022	MAM	BL	Update subpoena tracking chart and virtual files regarding acceptance of service for Motors Insurance, MIC Property & Casualty and CIM Insurance.	0.20	460.00	\$92.00
11/03/2022	GNB	BL	Voicemail for Brian Malone at Great American regarding subpoena; Revise tracking chart.	0.10	925.00	\$92.50
11/03/2022	GNB	BL	Internal PSZJ email regarding cost for hearing transcripts and orders to court reporting service.	0.10	925.00	\$92.50
11/03/2022	GNB	BL	Review Michael A. Matteo email and attachments to Todd Jacobs relating to subpoenas to insurers.	0.10	925.00	\$92.50
11/03/2022	MAM	BL	Revise and forward 2004 subpoenas to counsel for Guaranty National and Fireman's Fund.	0.20	460.00	\$92.00
11/03/2022	MAM	BL	Update tracking chart regarding status of 2004 subpoenas to counsel for Guaranty National and Fireman's Fund.	0.20	460.00	\$92.00
11/03/2022	MAM	BL	Revise and forward Hallmark 2004 subpoena for service.	0.20	460.00	\$92.00
11/03/2022	MSP	BL	Email exchange with John W. Lucas, Gillian N. Brown, et al. re: transcript of 2004 examination motion hearing.	0.10	1095.00	\$109.50
11/04/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding proof of service of TIG Insurance subpoena.	0.20	460.00	\$92.00
11/04/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding status of service of Hallmark Insurance subpoena.	0.20	460.00	\$92.00
11/04/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding completed service of Hallmark subpoena.	0.20	460.00	\$92.00
11/04/2022	MSP	BL	Email exchange with J. Freeman, Gillian N. Brown et al. re: discovery status.	0.10	1095.00	\$109.50
11/05/2022	GNB	BL	Telephone conference with Beth D. Dassa regarding AIG document production (.1); Email with Beth D. Dassa regarding RSUI and AIG document	0.20	925.00	\$185.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			productions (.1).			
11/05/2022	MSP	BL	Email exchange with Gillian N. Brown re: discovery status.	0.10	1095.00	\$109.50
11/05/2022	BDD	BL	Review AIG produced documents and email G. Brown re same.	1.10	495.00	\$544.50
11/06/2022	GNB	BL	Email with Iain A.W. Nasatir regarding insurance-related discovery.	0.10	925.00	\$92.50
11/06/2022	MSP	BL	Email exchange with Gillian N. Brown re: discovery status.	0.10	1095.00	\$109.50
11/06/2022	BDD	BL	Email G. Brown re AIG subpoena.	0.10	495.00	\$49.50
11/07/2022	GNB	BL	Telephone conference with Brian Malone at Great American regarding subpoena; Send email to Brian Malone regarding same; Update tracking chart regarding same.	0.10	925.00	\$92.50
11/07/2022	MAM	BL	Review and reply to email from Gillian N. Brown regarding production of documents from RSUI Insurance.	0.10	460.00	\$46.00
11/07/2022	MAM	BL	Update subpoena tracking chart regarding production of documents from RSUI Insurance.	0.10	460.00	\$46.00
11/07/2022	MAM	BL	Update virtual file regarding extension granted to Great American to respond to subpoena.	0.10	460.00	\$46.00
11/07/2022	BDD	BL	Emails with Everlaw re AIG upload.	0.10	495.00	\$49.50
11/08/2022	MAM	BL	Locate and forward documents from Everlaw to Gillian N. Brown.	0.20	460.00	\$92.00
11/08/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding responses and objections received from American Home Assurance.	0.20	460.00	\$92.00
11/08/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding responses and objections received from Illinois National Insurance.	0.20	460.00	\$92.00
11/08/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding responses and objections received from Landmark Insurance.	0.20	460.00	\$92.00
11/08/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding responses and objections received from National Union Fire Insurance.	0.20	460.00	\$92.00
11/08/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding proof of service of Hallmark Subpoena.	0.20	460.00	\$92.00

Pachulski Stang Ziehl & Jones LLP
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/09/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding declaration received from Arrowood.	0.20	460.00	\$92.00
11/09/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding Responses and Objections received from Star Stone Specialty Insurance.	0.20	460.00	\$92.00
11/09/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding declaration received from Philadelphia Indemnity Insurance.	0.20	460.00	\$92.00
11/09/2022	MAM	BL	Follow up email to Gillian N. Brown regarding status of AIG subpoena.	0.10	460.00	\$46.00
11/09/2022	MAM	BL	Review and reply to email from Gillian N. Brown regarding third tranche subpoenas to Paul Weiss.	0.20	460.00	\$92.00
11/09/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding declaration received from General Star.	0.20	460.00	\$92.00
11/09/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding declaration received from Monarch Insurance.	0.20	460.00	\$92.00
11/09/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding declaration received from NorthStar Reinsurance.	0.20	460.00	\$92.00
11/10/2022	GNB	BL	Email Beth D. Dassa regarding document productions for Everlaw upload.	0.10	925.00	\$92.50
11/10/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding response received from Aetna Insurance.	0.20	460.00	\$92.00
11/10/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding response received from MIC Property and Casualty Insurance.	0.20	460.00	\$92.00
11/10/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding response received from CIM Insurance.	0.20	460.00	\$92.00
11/10/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding response received from Motors Insurance.	0.20	460.00	\$92.00
11/10/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding response received from Century Indemnity Insurance.	0.20	460.00	\$92.00
11/10/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding response received from CHUBB.	0.20	460.00	\$92.00
11/10/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding response received from Federal Insurance.	0.20	460.00	\$92.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/11/2022	MAM	BL	Review and reply to email from Gillian N. Brown regarding status of TIG 2004 subpoena.	0.10	460.00	\$46.00
11/14/2022	IAWN	BL	Exchange emails with G. Brown regarding insurance discovery	0.10	1295.00	\$129.50
11/14/2022	MAM	BL	Update subpoena tracking chart and virtual file regarding response from Great American Insurance.	0.20	460.00	\$92.00
11/14/2022	MAM	BL	Follow up email to Gillian N. Brown regarding AIG subpoena status.	0.10	460.00	\$46.00
11/15/2022	GNB	BL	Email Michael A. Matteo and Sophia Lee regarding returned FedEx deliveries of Rule 2004 orders and subpoenas.	0.10	925.00	\$92.50
11/15/2022	GNB	BL	Email Brian Malone regarding Initial Document Requests to Great American.	0.10	925.00	\$92.50
11/15/2022	MAM	BL	Research for Gillian N. Brown regarding service addresses for Public Service Mutual Insurance and Magna Carta Companies, Inc.	0.20	460.00	\$92.00
11/15/2022	MAM	BL	Review and reply to emails from Gillian N. Brown regarding service addresses for Public Service Mutual Insurance and Magna Carta Companies, Inc.	0.20	460.00	\$92.00
11/16/2022	GNB	BL	Email with Iain A.W. Nasatir regarding AIG coverage.	0.10	925.00	\$92.50
11/16/2022	IAWN	BL	Exchange emails with G. Brown regarding missing policy	0.10	1295.00	\$129.50
11/16/2022	MAM	BL	Update tracking chart and virtual file regarding response from Gillian N. Brown to Great American Insurance.	0.20	460.00	\$92.00
11/17/2022	GNB	BL	Telephone conference with John W. Lucas regarding Rule 2004 insurance-related discovery.	0.20	925.00	\$185.00
11/17/2022	GNB	BL	Telephone conference with James I. Stang, Iain A.W. Nasatir, and John W. Lucas regarding Rule 2004 insurance-related discovery.	0.60	925.00	\$555.00
11/17/2022	IAWN	BL	Telephone call with team regarding status and insurance discovery	0.60	1295.00	\$777.00
11/17/2022	IAWN	BL	Review team emails regarding discovery	0.30	1295.00	\$388.50
11/17/2022	JIS	BL	Conference with PSZJ regarding insurance discovery.	0.60	1525.00	\$915.00
11/17/2022	MAM	BL	Update subpoena tracking chart and virtual file	0.20	460.00	\$92.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding Fireman's Fund and Guaranty National's response to subpoena.			
11/17/2022	MSP	BL	Email exchange with Gillian N. Brown, John W. Lucas, J. Amala, J. Sandler, S. Gershowitz, G. Novod, et al. re: litigation and mediation update.	0.80	1095.00	\$876.00
11/17/2022	JWL	BL	Call with G. Brown regarding production of insurance info (.2); call with PSZJ team regarding review of insurance info (.6);	0.80	1095.00	\$876.00
11/18/2022	GNB	BL	Review responses and objections to subpoenas issued pursuant to Rule 2004.	0.20	925.00	\$185.00
11/19/2022	BDD	BL	Email G. Brown re Everlaw indexing.	0.10	495.00	\$49.50
11/28/2022	MAM	BL	Update tracking chart and virtual file regarding declaration received from Great American Insurance.	0.20	460.00	\$92.00
11/28/2022	MAM	BL	Update tracking chart and virtual file regarding response received from Hallmark Specialty Insurance.	0.20	460.00	\$92.00
11/30/2022	GNB	BL	Telephone conference with Patrick Stoltz, counsel to Hallmark regarding Rule 2004 subpoena (.1); Email follow-up email to Patrick Stoltz memorializing conversation and update tracking chart regarding same (.1).	0.20	925.00	\$185.00
11/30/2022	MAM	BL	Update virtual file regarding response from Gillian N. Brown to Hallmark Insurance.	0.10	460.00	\$46.00
				40.30		\$37,721.00

Case Administration [B110]

11/10/2022	BDD	CA	Attend to calendaring matters with B. Anavim and mail G. Brown re same.	0.20	495.00	\$99.00
11/10/2022	BDD	CA	Email N. Brown re calendaring on order extending deadline.	0.10	495.00	\$49.50
				0.30		\$148.50

Claims Admin/Objections[B310]

11/03/2022	MSP	CO	Email exchange with John W. Lucas, et al. re: claims bar date.	0.10	1095.00	\$109.50
11/03/2022	JWL	CO	Email to counsel for survivors regarding deadline to file claims (.5);	0.50	1095.00	\$547.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/09/2022	JWL	CO	Review updated claims register (.3);	0.30	1095.00	\$328.50
11/09/2022	JWL	CO	Respond to inquires from state court counsel regarding proof of claim deadline and related (.6);	0.60	1095.00	\$657.00
11/14/2022	GNB	CO	Email with John W. Lucas regarding abuse claims.	0.10	925.00	\$92.50
11/14/2022	MSP	CO	Email exchange with John W. Lucas, Gillian N. Brown et al. re: filed abuse claims.	0.10	1095.00	\$109.50
11/14/2022	JWL	CO	Review summary of final filed claims (.6); review certain individual abuse claims (.7); review certain non-abuse claims (.5);	1.80	1095.00	\$1,971.00
11/18/2022	GNB	CO	Video conference with Michael A. Matteo, Sophia Lee, and Myra Kulick regarding sex abuse claims analysis.	0.40	925.00	\$370.00
11/18/2022	GNB	CO	Prepare materials for PSZJ team relating to sex abuse claims analysis.	0.50	925.00	\$462.50
11/18/2022	GNB	CO	Multiple telephone conferences with Sophia Lee regarding sex abuse claims analysis.	0.10	925.00	\$92.50
11/18/2022	GNB	CO	Review sex abuse claims analysis (.3); Email with Sophia Lee regarding same (.2); Email Michael A. Matteo, Sophia Lee, and Myra Kulick regarding same (.1); Telephone conferences with Sophia Lee (.3).	0.90	925.00	\$832.50
11/18/2022	GNB	CO	Email John W. Lucas regarding sex abuse claim analysis issues.	0.20	925.00	\$185.00
11/18/2022	GNB	CO	Email Jennifer Freeman and Jason Amala regarding proof of claim cover sheets on Epiq website.	0.10	925.00	\$92.50
11/18/2022	MAM	CO	Zoom call regarding survivor claims analysis.	0.40	460.00	\$184.00
11/21/2022	GNB	CO	Telephone conference with Sophia Lee regarding sex abuse claims analysis.	0.10	925.00	\$92.50
11/22/2022	GNB	CO	Review email from Kathryn Tran at Epiq regarding amended claim; Email with Sophia Lee regarding additional edits to sex abuse claims analysis.	0.10	925.00	\$92.50
				<hr/> 6.30		<hr/> \$6,219.50

Compensation Prof. [B160]

11/14/2022	GNB	CP	Revise and edit certificate of no objection to PSZJ's third monthly fee statement.	0.10	925.00	\$92.50
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/21/2022	GNB	CP	Edit and finalize PSZJ's fourth monthly fee statement.	0.30	925.00	\$277.50
11/21/2022	GNB	CP	Email with Beth D. Dassa regarding PSZJ's fourth monthly fee statement.	0.10	925.00	\$92.50
11/21/2022	BDD	CP	Prepare PSZJ Monthly fee statement (October 2022) (1.0); and emails G. Brown re same (.1).	1.10	495.00	\$544.50
11/21/2022	BDD	CP	Emails accounting re PSZJ October monthly fee statement.	0.10	495.00	\$49.50
11/28/2022	BDD	CP	Email G. Brown re PSZJ 1st quarterly fee application.	0.10	495.00	\$49.50
11/29/2022	BDD	CP	Emails N. Brown re PSZJ 1st quarterly fee application.	0.10	495.00	\$49.50
11/29/2022	BDD	CP	Email V. Arias re PSZJ 1st quarterly fee application and payments to the firm to date.	0.10	495.00	\$49.50
11/29/2022	BDD	CP	Draft PSZJ 1st Quarterly Fee Application (July 16, 2022 - October 31, 2022).	1.30	495.00	\$643.50
11/30/2022	BDD	CP	Email N. Brown re PSZJ 1st quarterly fee application.	0.10	495.00	\$49.50
				3.40		\$1,898.00

Comp. of Prof./Others

11/15/2022	GNB	CPO	Email Matthew Dundon, Tabish Rizvi, Michael Whalen, and Steven Landgraber regarding employment applications, quarterly fee applications, and monthly fee statements.	0.40	925.00	\$370.00
11/15/2022	BDD	CPO	Email G. Brown re Committee interim fee applications.	0.10	495.00	\$49.50
11/22/2022	GNB	CPO	Email with Miriam Levi regarding hearing on first quarterly interim fee application; Email Tabish Rizvi and Steven Landgraber regarding same.	0.10	925.00	\$92.50
11/28/2022	GNB	CPO	Telephone conference with Tabish Rizvi regarding monthly fee statements and quarterly fee application; Email template monthly fee statement to Tabish Rizvi.	0.20	925.00	\$185.00
11/30/2022	GNB	CPO	Revise template for financial advisors' first quarterly fee application (.1); Email Beth D. Dassa regarding same (.1).	0.20	925.00	\$185.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/30/2022	BDD	CPO	Research local rules and interim compensation procedures order re service of fee applications and email G. Brown re same.	0.30	495.00	\$148.50
11/30/2022	BDD	CPO	Prepare draft of Dundon and Island quarterly fee applications (3.8); and email G. Brown re same (.1)	3.90	495.00	\$1,930.50
					5.20	\$2,961.00

Financing [B230]

10/21/2022	MSP	FN	Email exchange with James I. Stang, John W. Lucas re: Notice of Intent to Seek Alternative Financing.	0.10	1095.00	\$109.50
11/01/2022	MBL	FN	Attention to new hearing and objection deadlines re DIP motion.	0.10	1275.00	\$127.50
11/02/2022	MSP	FN	Review supplemental declaration of R. Chiu re: DIP Financing Motion.	0.10	1095.00	\$109.50
11/02/2022	MBL	FN	Follow-up with J. Lucas re DIP objection status.	0.10	1275.00	\$127.50
11/02/2022	JWL	FN	Review and revise objection to DIP Motion (1.5);	1.50	1095.00	\$1,642.50
11/03/2022	MSP	FN	Review and comment on draft DIP financing motion objection (1.40); email exchange with John W. Lucas, et al. re: same (.10).	1.50	1095.00	\$1,642.50
11/03/2022	MBL	FN	Confer with J. Lucas re DIP issues.	0.20	1275.00	\$255.00
11/03/2022	MBL	FN	Review supplemental debtor declaration re DIP.	0.20	1275.00	\$255.00
11/03/2022	JWL	FN	Call with M. Litvak regarding DIP financing motion (.2); review and revise objection to the same (1.0);	1.20	1095.00	\$1,314.00
11/04/2022	GNB	FN	Coordinate with John W. Lucas and PSZJ staff for filing and service of DIP opposition for Sunday, November 6.	0.10	925.00	\$92.50
11/04/2022	MSP	FN	Email exchange with John W. Lucas, T. Rizvi, G. Novod, D. Meyers, Committee members et al. re: updated DIP budget (.2); review same (.20).	0.40	1095.00	\$438.00
11/04/2022	MBL	FN	Review and comment on budget and funds flow (0.3); follow-up with J. Lucas and Dundon re same (0.1).	0.40	1275.00	\$510.00
11/04/2022	MBL	FN	Review emails with committee re DIP status.	0.20	1275.00	\$255.00
11/04/2022	JWL	FN	Review updated budget for DIP motion (.4); email to committee regarding status (.7); call with T. Rizvi regarding DIP and budget (.3); call with A. Kornberg	1.70	1095.00	\$1,861.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding same (.3);			
11/05/2022	MSP	FN	Email exchange with John W. Lucas, G. Novod, et al. re: DIP financing budget review.	0.10	1095.00	\$109.50
11/05/2022	MBL	FN	Review revised DIP credit agreement, order, and commitment letter (0.7); emails with J. Lucas re same (0.2).	0.90	1275.00	\$1,147.50
11/05/2022	JWL	FN	Review Island/Dundon analysis of DIP budget (.8); Call with Paul Weiss and Teneo, Island/Dundon regarding DIP budget (.7); emails with committee and counsel regarding status of DIP negotiation and term sheet (.6);	2.10	1095.00	\$2,299.50
11/06/2022	MSP	FN	Email exchange with John W. Lucas, T. Rizvi, S. Landgraber, S. Gershowitz, James I. Stang, J. Scotto, et al. re: DIP financing and asset values.	0.50	1095.00	\$547.50
11/06/2022	JWL	FN	Review Teneo email regarding DIP budget (.2); call with Paul Weiss, Teneo, and Dundon regarding DIP and term sheet (.5); call with A. Kornberg regarding the same (.3); call with T. Rizvi regarding DIP budget (.2); call with J. Stang regarding DIP and term sheet (.3); review and revise DIP objection for filing (1.2); email to committee regarding DIP negotiations, filing objection, and next steps (.3);	3.00	1095.00	\$3,285.00
11/07/2022	GNB	FN	Email with PSZJ team and staff regarding coverage for tomorrow's hearing.	0.10	925.00	\$92.50
11/07/2022	IAWN	FN	Review emails between John Lucas and state court counsel regarding DIP objection.	0.30	1295.00	\$388.50
11/07/2022	MSP	FN	Email exchange with John W. Lucas, Committee members, G. Novod, L. Busch, et al. re: Committee DIP objection.	1.10	1095.00	\$1,204.50
11/07/2022	MBL	FN	Review filed DIP objection.	0.30	1275.00	\$382.50
11/07/2022	MBL	FN	Confer with J. Lucas re DIP objection.	0.10	1275.00	\$127.50
11/08/2022	MBL	FN	Review debtor reply in support of DIP motion; emails with J. Lucas re same.	0.60	1275.00	\$765.00
11/08/2022	JWL	FN	Review budgets and declarations and prepare for hearing on DIP motion (1.0); call with J. Weber regarding DIP hearing (.2); call with J. Stang regarding DIP hearing (1.0); prepare cross exam questions for DIP hearing (1.5); prepare oral argument for DIP hearing (1.5);	5.20	1095.00	\$5,694.00
11/09/2022	MBL	FN	Call with J. Lucas re outcome of DIP loan hearing.	0.20	1275.00	\$255.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/09/2022	JWL	FN	Prepare for hearing on DIP financing motion (2.0); email to committee regarding outcome of DIP motion (.2); review revised DIP order in response to debtor changes and respond (.2);	2.40	1095.00	\$2,628.00
				24.70		\$27,666.50

General Creditors Comm. [B150]

10/17/2022	MSP	GC	Attend Committee meeting.	1.50	1095.00	\$1,642.50
10/17/2022	MSP	GC	Email John W. Lucas re: case status, mediation, etc.	0.20	1095.00	\$219.00
10/20/2022	MSP	GC	Attend state court counsel meeting (.7); email exchange with John W. Lucas re: same (.10).	0.80	1095.00	\$876.00
10/24/2022	MSP	GC	Attend Committee meeting.	1.10	1095.00	\$1,204.50
10/24/2022	MSP	GC	Email John W. Lucas re: Committee meeting.	0.10	1095.00	\$109.50
10/27/2022	MSP	GC	Attend state court counsel meeting.	1.00	1095.00	\$1,095.00
10/31/2022	MSP	GC	Telephone call with John W. Lucas re: Committee meeting, etc.	0.30	1095.00	\$328.50
11/03/2022	IAWN	GC	Telephone call with state court counsel (partial attendance)	0.70	1295.00	\$906.50
11/03/2022	JWL	GC	Prepare for (.3) and attend call with committee's state court counsel regarding strategy (1.0);	1.30	1095.00	\$1,423.50
11/04/2022	GNB	GC	Email state court counsel regarding Rule 2004 insurance-related discovery.	0.10	925.00	\$92.50
11/05/2022	GNB	GC	Email Jennifer Freeman regarding Rule 2004 subpoenas to insurers.	0.10	925.00	\$92.50
11/06/2022	GNB	GC	Email John W. Lucas discovery update for tomorrow's Committee meeting.	0.10	925.00	\$92.50
11/07/2022	GNB	GC	Prepare for Committee meeting today.	0.20	925.00	\$185.00
11/07/2022	GNB	GC	Attend Committee video meeting.	1.00	925.00	\$925.00
11/07/2022	GNB	GC	Revise and edit draft minutes of today's Committee meeting.	0.10	925.00	\$92.50
11/07/2022	GNB	GC	Telephone conference with John W. Lucas regarding Committee meeting.	0.20	925.00	\$185.00
11/07/2022	GNB	GC	Select documents for Jennifer Freeman per request.	0.40	925.00	\$370.00
11/07/2022	IAWN	GC	Telephone call with Committee regarding mediation.	1.00	1295.00	\$1,295.00

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11/07/2022	MSP	GC	Attend Committee meeting.	1.00	1095.00	\$1,095.00
11/07/2022	MSP	GC	Email exchange with Gillian N. Brown, et al. re: Agenda Notice.	0.10	1095.00	\$109.50
11/07/2022	JWL	GC	Strategy emails with committee and counsel regarding next steps (1.5); strategy call with J. Amala (.7); prepare for (.3) and attend weekly committee meeting regarding strategy and next steps (1.0); call with G. Brown regarding upcoming hearing (.2);	3.70	1095.00	\$4,051.50
11/09/2022	GNB	GC	Email state court counsel regarding bar date.	0.10	925.00	\$92.50
11/10/2022	JIS	GC	Meeting with state court counsel regarding status and financing hearing.	0.40	1525.00	\$610.00
11/10/2022	JWL	GC	Weekly call with state court counsel regarding case status (.4);	0.40	1095.00	\$438.00
11/14/2022	GNB	GC	Revise Committee meeting minutes, and email to Committee and state court counsel.	0.10	925.00	\$92.50
11/14/2022	IAWN	GC	Telephone call with state court counsel regarding mediation	1.10	1295.00	\$1,424.50
11/14/2022	JIS	GC	Committee meeting regarding case status (partial attendance)	1.00	1525.00	\$1,525.00
11/14/2022	MSP	GC	Email exchange with Gillian N. Brown, et al. re: committee meeting minutes.	0.10	1095.00	\$109.50
11/14/2022	JWL	GC	Prepare for (.4) and attend weekly committee call (1.1);	1.50	1095.00	\$1,642.50
11/17/2022	GNB	GC	Email John W. Lucas regarding agenda for postponed state court counsel meeting tomorrow.	0.10	925.00	\$92.50
11/18/2022	GNB	GC	Attend Committee meeting via video conference.	1.10	925.00	\$1,017.50
11/18/2022	GNB	GC	Revise minutes of today's Committee meeting.	0.20	925.00	\$185.00
11/18/2022	GNB	GC	Prepare for today's video conference with state court counsel.	0.20	925.00	\$185.00
11/18/2022	GNB	GC	Telephone conference with state court counsel regarding settlement offer.	1.50	925.00	\$1,387.50
11/18/2022	GNB	GC	Email Jennifer Freeman and Jason Amala regarding Rule 2004 insurance-related discovery.	0.10	925.00	\$92.50
11/18/2022	IAWN	GC	Telephone call with Committee regarding mediation	1.10	1295.00	\$1,424.50

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11/18/2022	JIS	GC	Call with committee regarding counter offer.	1.10	1525.00	\$1,677.50
11/18/2022	JIS	GC	Call with state court counsel regarding response to counter offer.	1.50	1525.00	\$2,287.50
11/18/2022	MSP	GC	Email exchange with M. Dundon, John W. Lucas, et al. re: Committee meeting.	0.10	1095.00	\$109.50
11/18/2022	JWL	GC	Call with committee's individual counsel regarding revised term sheet (.5); follow up call with S. Gershowitz regarding same (.2); attend call with full committee regarding term sheet (1.1); revise terms of term sheet (.5).	3.30	1095.00	\$3,613.50
11/18/2022	IAWN	GC	Telephone call with State Court Counsel regarding mediation	0.30	1295.00	\$388.50
11/20/2022	GNB	GC	Email PSZJ team regarding agenda item for tomorrow's Committee meeting.	0.10	925.00	\$92.50
11/20/2022	IAWN	GC	Review G. Brown agenda re call	0.10	1295.00	\$129.50
11/20/2022	JWL	GC	Call with R. Liguori regarding term sheet (.4).	0.40	1095.00	\$438.00
11/21/2022	GNB	GC	Video conference call with state court counsel regarding settlement counter (.7); Prepare for same (.1).	0.80	925.00	\$740.00
11/21/2022	GNB	GC	Committee call regarding settlement counter (.9); Revise minutes relating to same (.1).	1.00	925.00	\$925.00
11/21/2022	GNB	GC	Email Committee regarding Committee meeting minutes.	0.10	925.00	\$92.50
11/21/2022	IAWN	GC	Review meeting minutes	0.10	1295.00	\$129.50
11/21/2022	JIS	GC	Committee call regarding response to Debtor's last offer.	0.90	1525.00	\$1,372.50
11/21/2022	JWL	GC	Call with committee members' counsel regarding term sheet (.8); call with committee members regarding the same (.9); call with G. Novod regarding term sheet (.2).	1.90	1095.00	\$2,080.50
11/22/2022	JWL	GC	Review revised term sheet from committee (.3); emails among PSZJ, committee, and counsel to committee members regarding the same (.4); call with A. Kornberg regarding term sheet (.4);	1.10	1095.00	\$1,204.50
11/28/2022	JIS	GC	Call J. Lucas regarding status of counteroffer.	0.10	1525.00	\$152.50
11/29/2022	JWL	GC	Email to committee regarding status of settlement term sheet (.5);	0.50	1095.00	\$547.50

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				37.40		\$42,691.00
Hearings						
10/12/2022	MSP	H	Prepare for hearing re: insurer Rule 2004 motion.	0.90	1095.00	\$985.50
10/13/2022	MSP	H	Appear at hearing re: insurer 2004 motion.	1.00	1095.00	\$1,095.00
10/19/2022	MSP	H	Appear at status conference re: Rule 2004 order re: insurers (.4); email exchange with Iain Nasatir re: same (.10).	0.50	1095.00	\$547.50
11/09/2022	IAWN	H	Attend DIP hearing (part of)	2.00	1295.00	\$2,590.00
11/09/2022	JIS	H	Attend hearing regarding DIP financing (partial).	2.10	1525.00	\$3,202.50
11/09/2022	JWL	H	Attend hearing on approval of DIP financing motion (2.4);	2.40	1095.00	\$2,628.00
				8.90		\$11,048.50
Insurance Coverage						
11/01/2022	RMS	IC	Legal research regarding insurance policies	1.40	1025.00	\$1,435.00
				1.40		\$1,435.00
Mediation						
10/20/2022	MSP	ME	Review and comment on potential counteroffer; email exchange with James I. Stang and John W. Lucas re: same.	0.20	1095.00	\$219.00
10/26/2022	MSP	ME	Meeting with John W. Lucas, et al. re: term sheet update.	0.80	1095.00	\$876.00
11/01/2022	IAWN	ME	Email John Lucas regarding mediation	0.10	1295.00	\$129.50
11/03/2022	MSP	ME	Email exchange with James I. Stang, John W. Lucas et al. re: status of exchange of offers with debtor.	0.10	1095.00	\$109.50
11/03/2022	JWL	ME	Call with mediator regarding case status (.2);	0.20	1095.00	\$219.00
11/06/2022	IAWN	ME	Exchange emails with Gillian Brown regarding insurance and mediation	0.10	1295.00	\$129.50
11/07/2022	JWL	ME	Call with mediator regarding term sheet status (.3);	0.30	1095.00	\$328.50
11/09/2022	IAWN	ME	Review state court counsel comments regarding mediation	0.20	1295.00	\$259.00
11/09/2022	JIS	ME	Email J. Lucas regarding recap of DIP hearing and counteroffer.	0.20	1525.00	\$305.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/10/2022	IAWN	ME	Telephone call with state court counsel regarding mediation (partial attendance)	0.30	1295.00	\$388.50
11/15/2022	IAWN	ME	Review John Lucas and state court counsel emails regarding counteroffer	0.10	1295.00	\$129.50
11/17/2022	IAWN	ME	Review J. Lucas emails regarding counteroffer	0.10	1295.00	\$129.50
11/17/2022	JIS	ME	Call with Paul Weiss and mediator regarding settlement offer.	0.70	1525.00	\$1,067.50
11/17/2022	JIS	ME	Call with J. Lucas following mediation regarding committee communication.	0.50	1525.00	\$762.50
11/17/2022	JWL	ME	Call with Madison counsel and mediator regarding term sheet (.7); call with J. Stang regarding same (.5); follow up call with J. Chapman regarding term sheet (.5);	1.70	1095.00	\$1,861.50
11/18/2022	JIS	ME	Email J. Lucas regarding counteroffer.	0.10	1525.00	\$152.50
11/19/2022	GNB	ME	Email with PSZJ regarding Debtor's 11/17/22 offer.	0.20	925.00	\$185.00
11/19/2022	IAWN	ME	Review counteroffer	0.10	1295.00	\$129.50
11/19/2022	IAWN	ME	Exchange emails with John Lucas regarding counteroffer	0.10	1295.00	\$129.50
11/20/2022	JIS	ME	Call J. Lucas regarding response to counter offer.	0.50	1525.00	\$762.50
11/29/2022	IAWN	ME	Email John Lucas regarding mediation	0.10	1295.00	\$129.50
				6.70	\$8,402.50	

Plan & Disclosure Stmt. [B320]

11/03/2022	JWL	PD	Call with A. Kornberg regarding plan term sheet (.3);	0.30	1095.00	\$328.50
11/07/2022	KHB	PD	Confer with J. Lucas re best interest test.	0.20	1395.00	\$279.00
11/07/2022	JWL	PD	Discussion with K. Brown regarding best interest issues (.2);	0.20	1095.00	\$219.00
11/08/2022	KHB	PD	Email J. Stang re best interest test.	0.20	1395.00	\$279.00
11/08/2022	MSP	PD	Email exchange with John W. Lucas re: Plan term sheet.	0.10	1095.00	\$109.50
11/08/2022	JWL	PD	Call with A. Kornberg regarding plan term sheet (.2); revise plan term sheet (1.5); call with T. Rizvi regarding term sheet (.4); call with G. Novod regarding term sheet (.5); call with S. Gershowitz	4.10	1095.00	\$4,489.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding term sheet (.6); call with J. Scotto regarding term sheet (.6); call with J. Freeman regarding term sheet (.3);			
11/09/2022	JWL	PD	Call with A. Kornberg re plan term sheet (.1); and email regarding same (.1);	0.20	1095.00	\$219.00
11/15/2022	MSP	PD	Email exchange with John W. Lucas, J. Freeman, et al. re: counteroffer.	0.10	1095.00	\$109.50
11/17/2022	JWL	PD	Review Madison's revised term sheet (.5);	0.50	1095.00	\$547.50
11/19/2022	MSP	PD	Email exchange with Gillian N. Brown, John W. Lucas, et al. re: Committee member counter-offer response.	0.20	1095.00	\$219.00
11/22/2022	MSP	PD	Email exchanges with Gillian N. Brown, John W. Lucas, J. Amala, J. Freeman, B. Hart, S. Gershowitz, et al. re: Committee member counter-offer response (.40) and review and address potential issues re: same (1.60).	2.00	1095.00	\$2,190.00
11/29/2022	JWL	PD	Call with A. Kornberg regarding plan term sheet (.3); call with I. Nasatir regarding insurance aspects of term sheet (.1);	0.40	1095.00	\$438.00
				8.50	\$9,427.50	

Ret. of Prof./Other

11/01/2022	GNB	RPO	Revise Dundon Advisers' employment application (1.4), declaration of Matthew Dundon in support thereof (.3), and order granting same (.1).	1.80	925.00	\$1,665.00
11/02/2022	MSP	RPO	Email exchange with Gillian N. Brown, et al. re: Dundon Advisers' retention application.	0.10	1095.00	\$109.50
11/07/2022	GNB	RPO	Email Andrea Schwartz regarding edits to Dundon Advisers LLC's employment application and related papers.	0.10	925.00	\$92.50
11/13/2022	GNB	RPO	Revise Island Capital Advisor LLC's employment application and proposed order thereon.	0.90	925.00	\$832.50
11/14/2022	GNB	RPO	Email Robert C. Lieber and Steven Landgraber regarding Island Capital Advisor LLC's employment application and proposed order thereon.	0.10	925.00	\$92.50
11/14/2022	GNB	RPO	Email with Steven Landgraber regarding edits to Island Capital Advisor LLC's employment application and Robert C. Lieber's declaration in support thereof.	0.20	925.00	\$185.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/14/2022	GNB	RPO	Revise and conform edits to Island Capital Advisor LLC's employment application and Dundon Advisers LLC's employment application.	0.60	925.00	\$555.00
11/14/2022	GNB	RPO	Email Matthew Dundon regarding Dundon Adviser's employment application and first quarterly fee application.	0.20	925.00	\$185.00
11/14/2022	GNB	RPO	Coordinate for Robert Liguori review and execution of Dundon Advisers LLC's employment application with emails to PSZJ staff and Robert Liguori.	0.20	925.00	\$185.00
11/14/2022	GNB	RPO	Email with Robert Liguori regarding Island Capital and Dundon Advisers' separate employment applications.	0.10	925.00	\$92.50
11/15/2022	GNB	RPO	Email Robert Liguori regarding Island Capital employment application.	0.10	925.00	\$92.50
11/15/2022	GNB	RPO	Finalize Island Capital and Dundon Advisers' employment applications for filing and service.	0.30	925.00	\$277.50
11/15/2022	GNB	RPO	Revise notices of presentment of employment applications relating to Dundon Advisers and Island Capital.	0.10	925.00	\$92.50
11/28/2022	GNB	RPO	Email with Matthew Dundon regarding status of and procedure relating to Dundon Advisers LLC employment application.	0.10	925.00	\$92.50
11/28/2022	BDD	RPO	Email G. Brown re Dundon & Island retention applications.	0.10	495.00	\$49.50
				5.00	\$4,599.00	
TOTAL SERVICES FOR THIS MATTER:						\$154,915.50

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Expenses

10/05/2022	AT	Auto Travel Expense [E109] KLS Worldwide Transportation Services, #241908*2, From EWR to NY, IAWN	285.63
10/05/2022	AT	Auto Travel Expense [E109] KLS Worldwide Transportation Services, #241908*1, From Home to LAX, IAWN	356.29
10/05/2022	HT	Hotel Expense [E110] Hilton New York, 1 night, IAWN	456.77
10/06/2022	AT	Auto Travel Expense [E109] Uber Transportation Services, JWL	41.96
10/06/2022	AT	Auto Travel Expense [E109] KLS Worldwide Transportation Services, #241908*3, From 1285 6th Ave NY to EWR, IAWN	191.11
10/06/2022	AT	Auto Travel Expense [E109] KLS Worldwide Transportation Services, #241908*4, From LAX to Residence, IAWN	474.31
10/06/2022	BM	Business Meal [E111] Little Purse, working meal, IAWN	49.84
10/07/2022	BM	Business Meal [E111] Queensyard Restaurant, Working Meal, JWL	200.00
10/08/2022	HT	Hotel Expense [E110] IC NY Times Square, 10/05/22 - 10/07/22, 2 nights, JWL	569.93
10/13/2022	TR	Transcript [E116] Veritext, Inv. 6114937, L. Canty	78.00
10/21/2022	CC	Conference Call [E105] AT&T Conference Call, JWL	2.31
11/03/2022	OS	Nationwide Legal, Inv. 51106, J. Washington	332.00
11/04/2022	LN	54162.00004 Lexis Charges for 11-04-22	6.52
11/07/2022	E107	Elite Transportation Services, Inv. 1866873, from PSZJ NY to USDC White Plains, S. Winns	231.89
11/07/2022	RE2	SCAN/COPY (57 @0.10 PER PG)	5.70
11/07/2022	RE2	SCAN/COPY (9 @0.10 PER PG)	0.90
11/09/2022	TR	Transcript [E116] Veritext, Inv. 6171222, L. Canty	145.20
11/10/2022	LN	54162.00004 Lexis Charges for 11-10-22	18.08
11/15/2022	FE	54162.00004 FedEx Charges for 11-15-22	23.99
11/15/2022	FE	54162.00004 FedEx Charges for 11-15-22	23.99
11/15/2022	PO	U.S. Postage	27.90
11/15/2022	RE	(4 @0.10 PER PG)	0.40
11/15/2022	RE	(3 @0.10 PER PG)	0.30
11/15/2022	RE	(218 @0.10 PER PG)	21.80
11/15/2022	RE2	SCAN/COPY (48 @0.10 PER PG)	4.80
11/15/2022	RE2	SCAN/COPY (41 @0.10 PER PG)	4.10
11/21/2022	FE	54162.00004 FedEx Charges for 11-21-22	23.65
11/21/2022	FE	54162.00004 FedEx Charges for 11-21-22	23.65

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11/21/2022	PO	U.S. Postage	0.57
11/21/2022	RE2	SCAN/COPY (96 @0.10 PER PG)	9.60
11/30/2022	RS	Research [E106] Everlaw Inc., Inv. 69481	500.00
Total Expenses for this Matter			\$4,111.19

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 11/30/2022

Total Fees	\$154,915.50
Total Expenses	4,111.19
Less Courtesy Discount	\$30,325.50
Total Due on Current Invoice	\$128,701.19

Outstanding Balance from prior invoices as of 11/30/2022 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
130635	07/31/2022	\$127,920.00	\$291.19	\$35,817.60
130861	08/31/2022	\$198,760.00	\$4,027.47	\$55,652.80
131167	09/30/2022	\$134,060.00	\$1,599.53	\$135,659.53
131231	10/31/2022	\$173,320.00	\$3,451.38	\$176,771.38
Total Amount Due on Current and Prior Invoices:				\$532,602.50